

Post-it Fax Note 7671

Date	6/23/04	# of pages	4
To	Wes Hardegrave		
From	Ken Grall		
Co./Dept	US EPA		
Co.	GA EPD		
Phone #	404-562-8938		
Phone #	404-651-8668		
Fax #	404-562-8896		
Fax #	404-651-9425		

6/12/04

Coosa River Basin Initiative, (CRBI), comments to GE proposal to clean the contaminate PCB from the area of it's former Rome operation.

By Matt Reid, Executive Director and Katy Eady, Program Coordinator, CRBI

The Coosa River Basin Initiative, (CRBI), presents the following comments on GE's proposed clean-up of the PCB contaminate that it left in Rome, and probably downstream, when it ceased operations in 1977 in this locale. CRBI has been following this issue since its inception in 1992. Thank you for allowing us to comment.

GE's previous permit (HW-043(s)-2) was classified as a hazardous waste permit and only allowed waste storage and on site groundwater monitoring. The new modification to the permit, applied for May 16, 2003, proposed a corrective action plan to begin cleaning commercial property affected by PCBs, but the Georgia Environmental Protection Division, (EPD), turned down the original proposal saying it was flawed.

The plan GE submitted last fall called for leaving highly contaminated soils in place, covering the property with an impermeable cap, and installing a groundwater pump and treat system to prevent contaminated groundwater from leaving the site. This plan is not the best for the community because it does not follow federal standards, which require that GE present a full range of options for a cleanup action, and it would remove the commercial property from any future development.

EPD also had a list of scientific reasons to claim that the proposal was unacceptable. First, EPD objected to relying solely on a pump and treat system to contain high levels of contamination. They said due to the karst topography any highly contaminated source areas must be removed. EPD also objected to GE's plan of capping the property because horizontal groundwater could carry contaminants. The Environmental Protection Agency agreed with the state and suggested that GE remove any contaminated soils in order to protect human health and the environment.

Richard Lester, facilities and site leader for the closed GE plant in Rome, responded to the EPD and US Environmental Protection Agency, (EPA), by saying that the proposal was not meant to be the only option and that GE was willing to make changes.



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Now, after almost a year of debate over how to cleanup the commercial property GE has submitted a new proposal that follows EPD and EPA guidelines. The new cleanup effort will begin by focusing on GE's commercial property corridor, stretching from Dr. Richard Muller's office to the West Rome Wal-Mart.

The cleanup will consist of removing contaminated soil and pumping and treating contaminated groundwater via a water treatment facility that will be built south of the former Lowe's property. As of now the cleanup will go at least one foot down into the water table. EPD will be taking confirmation samples to ensure that GE cleans the water to at least 1.55 ppm of PCBs, which is the state wide acceptable level.

According to Lester, "GE has agreed to a stringent cleanup plan that is fully protective of human health and the environment". Lester said that during the cleanup all areas will be fenced, soil samples will be taken from ground surface to bedrock, new pumping wells will be installed, more groundwater monitoring wells will be installed, and a geologist will thoroughly review the area and provide insight into what should be done regarding the cleanup. EPD will also require GE to submit 90-day reports explaining their progress on the cleanup.

CRBI would like to know if these proposals are going to be the only two considered, and what is the EPD and EPA perspective on this current proposal?

We would also like to see the monitoring time increased to 30 day intervals. CRBI would like to have access to that data, and we would like to see someone independent of GE collect it.

If the monitoring plan shows that the new approach does not work we want it to be adapted by GE so that it does, and we want this to be enforced by the agency so that GE complies in a timely manner so that Rome's health is not at risk. If the PCB contaminate can be more efficiently cleaned, CRBI wants to know how, and we want to see GE explore that option, and we want the governments to make sure that prospect is explored.

Finally, when the site is cleaned to acceptable Federal clean water standards we would like to see GE sell the site, so that it can be used in Rome. This does not divulge GE of its responsibility to clean the site.

Thank you for letting us comment on this important topic.

**Richard Lester**

Rome Facilities and Team Leader

General Electric Company

1838 Redmond Circle, Rome, GA 30165-1319

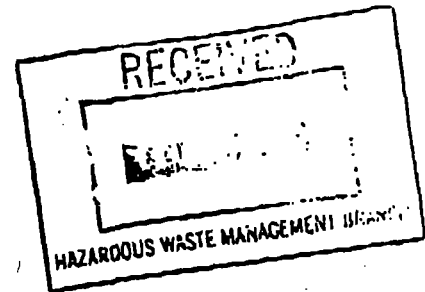
Ph: (706) 291-3488

Fax: (706) 291-3221

e-mail: richard.lester@corporate.ge.com

June 17, 2004

Mr. David Yardumian
Program Manager
Georgia Environmental Protection Division
Hazardous Waste Management Branch
Floyd Towers East, Suite 1154
2 Martin Luther King Jr. Drive, S.E.
Atlanta, Georgia 30334



Re: Amendment to Permit No. HW-043(S)-2
General Electric Company, Rome, Georgia

Dear Mr. Yardumian:

I am writing on behalf of General Electric Company ("GE") concerning the above-referenced hazardous waste facility permit (the "Permit"). On April 29, 2004, your office sent a copy of EPD's proposed modifications to the Permit to GE. This letter constitutes GE's comments on the proposed modifications to the Permit.

GE supports the amendment to the Permit. The purpose of the amendment is to incorporate the agreed-upon corrective action to be conducted on the off-site properties along Redmond Circle referred to as the Commercial Property Corridor. This work to be conducted is a significant step forward in addressing environmental issues related to historic operations of the Rome plant and will be of great benefit to the Rome community.

As you know, GE had concerns/need for clarification regarding the language of several of the modified provisions that were forwarded to us. These included the following provisions: I.A.3.; I.A.4.; III.D.4.a.ii.; III.E.5., III.E.6.b.i. and iii; III.E.6.b.ii.B.; III.E.6.b.iv.; and, III.K. We appreciated the opportunity to meet with EPD and EPA on June 10th to discuss these provisions. At the meeting, we discussed our concerns with these provisions and the parties proposed and discussed alternative language for the permit. GE appreciates the fact that we were able to reach consensus on the language to be used in the permit modification once finalized, which is reflected in the revised draft permit that EPD forwarded to us on June 17, 2004 (copy attached).

Mr. David Yardumian

June 17, 2004

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GE appreciates the opportunity to comment on EPD's proposed modifications to the Permit. GE is eager to commence the work on the Commercial Property Corridor once the permit modification is finalized.

Thank you for your consideration of GE's comments.

Sincerely,

Richard Lester

Richard Lester

Cc: Jennifer Kaduck
Tim Ritzka